

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION

CASE NO.: 0:22-cv-61009-RS

EDGAR QUINTERO,

Plaintiff,

v.

HEALTHCARE REVENUE RECOVERY  
GROUP LLC D/B/A ARS ACCOUNT  
RESOLUTION SERVICES,

Defendant.

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**DEFENDANT, HEALTHCARE REVENUE RECOVERY GROUP, D/B/A ARS  
ACCOUNT RESOLUTION SERVICES' NOTICE OF NON-COMPLIANCE**

COMES NOW, Defendant, Healthcare Revenue Recovery Group, LLC. d/b/a ARS Account Resolution Services, by and through their undersigned counsel, hereby notifies the Court of Plaintiff, Edgar Quintero's Non-Compliance with Order Granting Unopposed Motion to Withdraw as Counsel ("Order"), ECF No. 20, and in support hereof states:

1. On October 3, 2022, the Court entered an Order Granting an Unopposed Motion to Withdraw as Counsel for Plaintiff. **[ECF No. 20]**.
2. The Order required Plaintiff's former counsel to provide the Order to Plaintiff within two (2) business days and file a Notice of Compliance. Additionally, the Order required Plaintiff to retain new Counsel within fourteen (14) days of service or file a notice that he intends to proceed without counsel. *Id.*
3. On October 5, 2022, Plaintiff's former counsel filed its Notice of Compliance advising the Court it provided the Order to Plaintiff. **[ECF No. 21]**.

4. As of the date of this Notice, Plaintiff, Edgar Quintero has failed to notify the Court that he has retained new counsel.

5. As of the date of this Notice, Plaintiff, Edgar Quintero has failed to notify the Court that he wishes to proceed without counsel.

6. Plaintiff was required to notify the Court of new counsel or notify the Court he wished to proceed without counsel by October 19, 2022.

7. Non-compliance with the Order may result in a recommendation to the district Judge that the case be dismissed for lack of prosecution. **[ECF No. 20]**

8. As a result of Plaintiff's non-compliance, Defendant is unable to further its defense in the litigation proceedings.

WHEREFORE, Defendant, Healthcare Revenue Recovery Group, LLC. d/b/a ARS Account Resolution Services respectfully requests this Honorable Court to enter an Order stating the case be dismissed for lack of prosecution or enter an order for other relief which the Court deems just and proper.

Dated this **7<sup>th</sup> day of November 2022.**

Respectfully submitted,

/s/ Ernest H. Kohlmyer, III  
Ernest H. Kohlmyer, III

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed on **November 7, 2022**, via the Clerk of Court's CM/ECF system. I further certify that the foregoing has been sent via electronic transmission to the following: Alejandro E. Figueroa, Esquire at [alejandrof@sulaimanlaw.com](mailto:alejandrof@sulaimanlaw.com) and Franklin Jara, Esquire at [fjara@sulimanlaw.com](mailto:fjara@sulimanlaw.com) (*Attorneys for Plaintiff*).

/s/ Ernest H. Kohlmyer, III

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*Account Resolution Services*